

The Honorable James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware
corporation, AMAZON.COM SERVICES
LLC, a Delaware limited liability company,
and AMAZON TECHNOLOGIES, INC., a
Nevada corporation,

Plaintiffs,

v.

Does 1-20, unknown parties doing business as
“REKK,” and the following individuals:
Domantas Radeckas, Noah Page, Skylar
Robinson, Luke Colvin, Alejandro Taveras,
Andrew Ling, Brandon Sukhram, Cosmin
Sopca, Jenny Tran, Olaf Booij, and Ryan
Bates,

Defendants.

No. 2:23-cv-01879-JLR

PLAINTIFFS’ STATUS REPORT

Plaintiffs Amazon.com, Inc., Amazon.com Services LLC, and Amazon Technologies,
Inc., (“Amazon”) submit this Status Report in accordance with the Court’s April 16, 2024 Order.
Dkt. 77. Amazon has now served the Amended Complaint, Dkt. 89, on all but one Defendant,
Cosmin Sopca, whose service is outstanding with the Hague Ministry in the United Kingdom.

A. Continued Efforts to Identify Unnamed Defendants

As to Does 1-20, Amazon filed a Second Motion for Expedited Discovery on June 25, 2024, to uncover the identities of any remaining REKK Operator Defendants. During its investigation, Amazon uncovered additional email addresses and bank accounts that may uncover Domantas Radeckas's co-conspirators. Amazon has outstanding subpoenas to Google, Microsoft, Telegram and Robinhood. Amazon has not identified any other remaining REKK Operator Defendants at this time. As discussed in Amazon's Response to Show Cause Order, Amazon has identified individuals linked to accounts transferring money to facilitate the scheme. One of those individuals is located in a country that is not a signatory to The Convention on the Taking of Evidence Abroad in Civil or Commercial Matters, which complicates Amazon's investigation. Nevertheless, Amazon believes that individual possesses information regarding other potential REKK Operator Defendants and is continuing its investigation.

B. Current Procedural Status of Case Against the Named Defendants

1. Defendants Served and/or Resolved

Amazon has served the Amended Complaint on all Defendants except Cosmin Sopca. It has either resolved claims or obtained clerk's defaults against all served Defendants except for Domantas Radeckas, who waived service on September 04, 2024. Dkt. 102. Amazon is prepared to hold a scheduling conference with Radeckas as soon as the Court orders one.

2. Defendant Awaiting Service: Cosmin Sopca

The Hague Ministry in the United Kingdom has not yet completed service of the Amended Complaint on the one outstanding international defendant, Cosmin Sopca. Sopca was served with the original Complaint on July 15, 2024.

Amazon reinitiated service under The Convention on the Service Abroad of Judicial and Extrajudicial Documents to serve Sopca with the Amended Complaint on June 21, 2024. On September 24, 2024, the Hague Ministry in the UK returned the service request requesting a duplicate copy for service, which was sent by overnight delivery to the Ministry on October 8, 2024.

1 DATED this 14th day of October, 2024.

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18 I certify that this memorandum contains 369
19 words, in compliance with the Local Civil
20 Rules.
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